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ACCESSION NBR: 8309230429 DOC. DATE: 83/09/21 NOTARIZED: NO DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
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SUBJECT: Forwards "Leakage Reduction Program Test Results," per
 NUREG-0737, Item III.D.1.1, "Primary Coolant Sources Outside
 Containment Structure."

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September 21, 1983

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

The purpose of this letter is to provide a summary of the initial test results of the leak reduction program. NUREG 0737, Item III.D.1.1, established requirements for developing a program to reduce leakage from piping systems outside containment that could contain highly radioactive fluid following an accident or transient. The program has two phases.

Phase I, the immediate leak reduction program, included measurement of component leak rates with the systems in operation. On those components where significant leakage occurred, immediate measures were taken to reduce or eliminate that leakage. The component leakage measured for the ESF systems tested is 873 cc/hour. Further discussion of leakage measurements obtained is included in the enclosure. This is well within the FSAR Chapter 15 (Table 15.6-19) assumption of 2486 cc/hour used for offsite dose calculations.

Phase II involves a continuing leak reduction program of periodic visual inspections and integrated leak tests to reduce and maintain leakage to as-low-as practical levels. As leaks are detected, maintenance will be performed on the components to eliminate or reduce the leakage rate. The immediate and proposed continuing leak reduction programs were reported and discussed in Amendment 23 to SCE's Response to NRC Action Plan, NUREG 0660, San Onofre Nuclear Generating Station, Units 2 and 3; Item III.D.1.1: "Primary Coolant Sources Outside the Containment Structure". In Supplement 1 to the Safety Evaluation Report the staff concluded that the leak reduction and leak test programs meet the requirements of NUREG 0737, Item III.D.1.1, and are acceptable.

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September 21, 1983

To implement the continuing leak reduction program, a station procedure has been written which requires a semi-annual walkdown and incorporates the applicable inspections performed during the immediate leak reduction program. The first two walkdowns were performed in February, 1983 and August, 1983 in compliance with Technical Specification 6.8.4.a.i. SCE is currently evaluating the test results and the data gathering procedure. Observable leakage rates identified in this walkdown were reported to the Maintenance Department. The components will subsequently be inspected and repaired where necessary. The refueling interval leak test requirements of Technical Specification 6.8.4.a.ii are satisfied by four procedures which individually cover the HPSI, LPSI, CS, and PAS Systems. These tests will be performed at the next refueling outage.

While the continuing leak reduction program has effectively reduced leakage, SCE expects the program to evolve through some significant changes during the first refueling cycle as experience gained is incorporated into program improvements. SCE has hired a consultant to review the program and the results obtained to determine what changes, if any, (i.e., frequency of walkdown inspections and integration into other ongoing programs) are necessary to improve the effectiveness of the program.

If you have any questions or comments, please contact me.

Very truly yours,



M. O. Medford
Supervising Engineer
San Onofre Units 2 and 3 Licensing

Enclosure

cc: Mr. H. Rood, Project Manager
Licensing Branch No. 3

Mr. A. E. Chaffee
NRC Site Inspector